

Michael D. Rounds (NV Bar No. 4734)  
Arthur A. Zorio (NV Bar No. 6547)  
BROWNSTEIN HYATT FARBER SCHRECK, LLP  
5371 Kietzke Lane  
Reno, NV 89511  
Telephone: (775) 324-4100  
Facsimile: (775) 333-8171  
Email: mrounds@bhfs.com  
azorio@bhfs.com

[additional counsel on signature page]

*Counsel for Defendants SIMILASAN CORPORATION  
and SIMILASAN AG*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

T.R.P. COMPANY, INC.,

Plaintiff,

v.

SIMILASAN AG AND SIMILASAN  
CORPORATION,

Defendants.

Case No.: 2:17-cv-02197-JCM-DJA

**JOINT STIPULATION AND  
~~PROPOSED~~ ORDER TO EXTEND  
PRE-TRIAL ORDER DEADLINE  
(THIRD REQUEST)**

Plaintiff T.R.P. Company, Inc. ("TRP") and Defendants Similasan AG and Similasan Corporation (collectively, "Similasan"), by and through their counsel of record, hereby stipulate and agree to extend the Pre-Trial Order deadline of the Joint Discovery Plan for 4 weeks. The parties have engaged in substantial settlement negotiations, have reached a non-binding settlement in principle on most of the terms, counsel for TRP has prepared a settlement agreement that is under review by counsel for Similasan, and the parties anticipate finalizing and executing the formal, binding settlement agreement in the next couple of weeks. Although the request is being made fewer than 21 days from the pending deadline, the parties believe that an extension would be in the interests of judicial economy and efficiency. The proposed deadline to be

extended is:

1. Pre-Trial Order: September 22, 2020 to October 22, 2020.

Discovery is completed and there are no pending motions.

The Parties represent that this Stipulation is sought in good faith and for good cause. The Parties are actively involved in settlement discussions that will fully resolve the matter and a written settlement agreement has been prepared and is under review. The Parties hereby jointly respectfully request that the aforementioned Pre-Trial Order deadline be extended accordingly.

Dated: September 17, 2020

Respectfully submitted,

DICKINSON WRIGHT PLLC

BROWNSTEIN HYATT FARBER SCHRECK, LLP

By: /s/ Meaghan H. Kent

By: /s/ Arthur A. Zorio

MICHAEL N. FEDER  
(NV Bar No. 7332)  
8363 West Sunset Road, Suite 200  
Las Vegas, Nevada 89113-2210  
Email: mfeder@dickinson-wright.com

Michael D. Rounds (NV Bar No. 4734)  
Arthur A. Zorio (NV Bar No. 6547)  
5371 Kietzke Lane  
Reno, NV 89511  
Telephone: (775) 324-4100  
Facsimile: (775) 333-8171  
Email: mrounds@bhfs.com  
azorio@bhfs.com

VENABLE LLP

CROWELL & MORING LLP

Daniel S. Silverman (*Pro Hac Vice*)  
2049 Century Park East, Suite 2300  
Los Angeles, California 90067  
Tel: (310) 229-0373  
Fax: (310) 229-9901  
Email: dssilverman@venable.com

Valerie Goo (*pro hac vice*)  
Raija J. Horstman (*pro hac vice*)  
515 S. Flower Street, 40<sup>th</sup> Floor  
Los Angeles, CA 90071  
Telephone: (213) 622-4750  
Facsimile: (213) 622-2690  
Email: vgoo@crowell.com  
rhorstman@crowell.com

Meaghan H. Kent (*Pro Hac Vice*)  
600 Massachusetts Avenue., NW  
Washington, D.C. 20001  
Tel: (202) 344-4000  
Fax: (202) 344-8300  
Email: mhkent@venable.com

*Counsel for Defendants*  
**SIMILASAN CORPORATION and**  
**SIMILASAN AG**

*Attorneys for Plaintiff T.R.P. Company,*  
*Inc.*

**IT IS SO ORDERED.**

  
**UNITED STATES MAGISTRATE JUDGE**

Dated: September 18, 2020

**CERTIFICATE OF SERVICE**

Pursuant to FRCP 5(b), I certify that I am an employee of BROWNSTEIN HYATT FARBER SCHRECK, LLP, and on this 17<sup>th</sup> day of September, 2020, I served the document entitled, **JOINT STIPULATION AND [PROPOSED] ORDER TO EXTEND PRE-TRIAL ORDER DEADLINE**, on counsel of record through the CM/ECF system.

/s/ Jeff Tillison  
Employee of Brownstein Hyatt Farber  
Schreck, LLP

**BROWNSTEIN HYATT FARBER SCHRECK, LLP**  
5371 Kietzke Lane  
Reno, Nevada 89511  
Tel. 775-324-4100  
Fax. 775-333-8171